

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS**

IN RE:)
) Case No. 19-12807
Rondle Johnson, Jr.)
) Chapter 13
)
Debtor(s)) Judge Timothy A. Barnes
)
) Hearing: 9/26/2019 at 9:30 a.m.
)

NOTICE OF OBJECTION TO CLAIM 03

TO: All Persons/Entities Indicated on the Attached Service List

PLEASE TAKE NOTICE that Debtor has filed with the Court an Objection to Claim 03. A copy of the objection and proposed order are attached hereto.

PLEASE TAKE NOTICE that a hearing on said objection will take place on 9/26/2019 at 9:30 a.m., or as soon thereafter as Counsel may be heard, before the Honorable Judge Timothy A. Barnes, or whomever is sitting in said Judge's stead at the following address: Courtroom 744, United States Bankruptcy Court, 219 S. Dearborn, Chicago, Illinois.

Dated: 8/21/2019

Rondle Johnson, Jr.

/s/ Michael N. Oreluk

By: Michael N. Oreluk

Michael N. Oreluk
ERWIN LAW, LLC
4043 N. Ravenswood
Suite 208
Chicago, IL 60613
(773) 525-0153

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on 8/21/2019 I mailed a copy of this notice, along with the attached motion and order, to all persons/entities listed on the attached service list by depositing same in a U.S. Post Office Box located in Chicago, Illinois, postage prepaid, except that service was provided to the Chapter 13 Trustee and the United States Trustee through electronic notice via the Clerk of the Bankruptcy Court's ECF system.

/s/ Michael N. Oreluk

SERVICE LIST

VIA US MAIL

Illinois Department of Revenue

Bankruptcy Section, P.O. Box 19035

Springfield, IL 62794-9035

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OBJECTION TO CLAIM 03

NOW COMES Debtor, by and through Debtor's counsel Michael N. Oreluk, and for Debtor's Objection to Claim 03, states as follows:

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §1334. This matter is a core proceeding within the meaning of 28 U.S.C. §157(b)(2). Venue is proper in this Court pursuant to 28 U.S.C. §1409(a).
2. The petition was filed on May 2, 2019.
3. On August 1, 2019, the Illinois Department of Revenue (hereinafter the "IDOR") filed a Proof of Claim as Claim No. 03 (hereinafter the "Claim"). Said Claim is attached hereto as Exhibit A.
4. Debtor was not required to file taxes for the tax periods ending 12/31/2015 through 12/31/2018.
5. Debtor was the primary taker for Debtor's grandmother during those years. Debtor was not employed. Debtor was also not operating Debtor's LLC during those years.
6. Debtor incorporates herein the filed exhibits including an affidavit regarding Debtor's taxes for those years.

WHEREFORE, Debtor respectfully requests that this Court sustains Debtor's Objection to Claim 03 and enters the attached proposed order, and for such other and further relief this Court deems fair and just.

Dated: 8/21/2019

Respectfully submitted,
Rondle Johnson, Jr.

/s/ Michael N. Oreluk
By: Michael N. Oreluk

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